

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1(h), Class Representatives Laborers Pension Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Angelica Galkin (collectively, “Plaintiffs”) and Defendants James D. Bennett, Matthew K. Grubb, and Tom L. Ward, and nominal defendant SandRidge Energy, Inc. (collectively, “Defendants,” and together with Plaintiffs, “Parties”), by and through their undersigned counsel, respectfully move the Court for an Order modifying the Court’s Eighth Amended Scheduling Order (Dkt. No. 462) as set forth below. The parties in *Duane & Virginia Lanier Trust v. SandRidge Energy, Inc., et al.*, No. 15-cv-00634-G (W.D. Okla.) (“*Lanier Trust*”) are concurrently filing a joint motion for a corresponding schedule extension in the *Lanier Trust* action.

The Parties have previously moved for nine modifications to the case schedule. The Court granted the first motion on October 9, 2018 (Dkt. 367); the second motion on January 18, 2019 (Dkt. 399); the third motion on March 20, 2019 (Dkt. 410); the fourth motion on April 19, 2019 (Dkt. 414); the fifth motion on July 2, 2019 (Dkt. 438); the sixth motion on October 25, 2019 (Dkt. 456); the seventh motion on December 27, 2019 (Dkt. 458); the eighth motion on March 6, 2020 (Dkt. 460); and the ninth motion on March 16, 2020 (Dkt. 462).

Good cause exists to modify the Eighth Amended Scheduling Order. Counsel have taken precautions to address the risk of COVID-19. These precautions have necessarily continued to disrupt normal business activity. Further, the number of motions recently filed by the Parties supports an extension. On April 2, 2020, Defendants collectively filed a total of two motions for summary judgment, two motions to exclude experts, and one motion to reconsider the denial of Defendants' motion to dismiss; and Plaintiffs filed a motion to exclude one of Defendants' expert witnesses. The Parties therefore request an additional 30 days for their respective oppositions to, and replies in support of, the motions filed on April 2. Extending the current deadlines will promote efficiency by allowing the Parties adequately to brief the issues to be decided.

### **RELIEF REQUESTED**

Accordingly, and for good cause shown, the Parties respectfully request that the Court modify the specific dates contained in its Eighth Amended Scheduling Order (Dkt. No. 462) as set out in the chart below. A proposed order is filed herewith.

<b>Deadline</b>	<b>Current Date</b>	<b>Proposed Date</b>
Parties to file responses to opposing parties' dispositive motions and motions to exclude expert testimony under <i>Daubert</i> and/or Federal Rule of Evidence 702	June 12, 2020	July 13, 2020
Parties to file replies, if any, in support of their dispositive motions and motions to exclude testimony under <i>Daubert</i> and/or Federal Rule of Evidence 702	July 13, 2020	September 11, 2020
Parties to file final lists of witnesses and final lists of exhibits	August 31, 2020	October 26, 2020
Parties to file objections to exhibits	September 24, 2020	November 20, 2020

Dated: April 16, 2020

Respectfully submitted,

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2020, I electronically transmitted the attached Joint Motion for Schedule Extension using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

*/s/ Evan J. Kaufman*

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EVAN J. KAUFMAN